

**WILLKIE FARR & GALLAGHER LLP**

BENEDICT Y. HUR (SBN: 224018)

bhur@willkie.com

SIMONA AGNOLUCCI (SBN: 246943)

sagnolucci@willkie.com

EDUARDO E. SANTACANA (SBN: 281668)

esantacana@willkie.com

LORI C. ARAKAKI (SBN: 315119)

larakaki@willkie.com

ARGEMIRA FLOREZ (SBN: 331153 )

aflorez@willkie.com

HARRIS MATEEN (SBN: 335593)

hmateen@willkie.com

One Front Street, 34<sup>th</sup> Floor

San Francisco, CA 94111

Telephone: (415) 858-7400

Facsimile: (415) 858-7599

Attorneys for Defendant

GOOGLE LLC

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

ANIBAL RODRIGUEZ, et al. individually and  
on behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**DECLARATION OF EDUARDO E.  
SANTACANA IN SUPPORT OF  
PLAINTIFFS' ADMINISTRATIVE  
MOTIONS TO SEAL DKT NOS. 254 &  
257**

Judge: Hon. Richard Seeborg  
Courtroom: 3, 17<sup>th</sup> Floor  
Action Filed: July 14, 2020  
Trial Date: Not Yet Set

1 I, EDUARDO E. SANTACANA, declare:

2 1. I am an attorney licensed to practice law in the State of California and am a partner  
3 with the law firm of Willkie Farr & Gallagher LLP, located at One Front Street, San Francisco,  
4 California 94111, counsel for Defendant Google LLC (“Google”) in the above-captioned action.  
5 Unless otherwise stated, the facts I set forth in this declaration are based on my personal  
6 knowledge or knowledge I obtained through my review of corporate records or other  
7 investigation. If called to testify as a witness, I could and would testify competently to such facts  
8 under oath.

9 2. I submit this declaration in support of two Administrative Motions to Consider  
10 Whether Another Party’s Material Should Be Sealed filed by Plaintiffs. Dkt. Nos. 254 & 257. I  
11 have reviewed Plaintiffs’ Motions to Seal and the Civil Local Rules of this Court governing such  
12 motions, and submit this supporting declaration under Civil L.R. 79-5(e). Per the instructions  
13 provided on the Northern District of California’s website, this declaration is drafted so that it does  
14 not contain confidential information and does not need to be filed under seal. *See*  
15 <http://www.cand.uscourts.gov/ecf/underseal>.

16 3. Steve Ganem, a Google Director of Product Management, has also reviewed the  
17 information Google seeks to keep under seal and his declaration is submitted in support of the  
18 Motion to Seal, on behalf of the Designating Party within the meaning of Civil L.R. 79-5. *See*  
19 Declaration of Steve Ganem in Support of Plaintiffs’ Motion to Seal filed concurrently herewith.

20 4. On October 27 and October 28, 2022, Plaintiffs filed administrative motions to seal  
21 material filed in support of Plaintiffs’ Motion for Relief from the Case Management Schedule  
22 (“Motion for Relief”) (Dkt. 254) and Plaintiffs’ Motion for Leave to File Fourth Amended  
23 Complaint (“Motion for Leave”) (Dkt. 257). I have reviewed the documents Plaintiffs seek to file  
24 under seal pursuant to Civil Local Rule 79-5, unredacted copies of which have been filed at  
25 Dkt. Nos. 254 and 257, as well as the Civil Local Rules of this Court governing such motions.

26 5. Google seeks to seal narrowly tailored portions of only the following exhibits, all of  
27 which I have reviewed:  
28

Document	Portions Sought to Be Sealed
Exhibit 2 to Motion for Relief (Dkt. 254-4)	Project code name “Na****” at Tr. 5:10.
Exhibit 4 to Motion for Relief (Dkt. 254-6)	Document in its entirety.
Exhibit 19 to Motion for Leave (Dkt. 257-27)	Portions identified in Exhibit A, which reflects Google’s proposed redactions to Exhibit 19.
Exhibit 23 to Motion for Leave (Dkt. No. 257-31)	Project code name “Pi****” at GOOG-RDGZ-00020692 (2 instances) and -697 (3 instances); non-public email address of a Google employee at -692.
Exhibits 26 to Motion for Leave (Dkt. No. 257-34)	Project code name “Pi****” at GOOG-RDGZ-00144766 (3 instances)
Exhibits 4–9, 11, 13–18, 20–22, 24, 27–31, 33 to Motion for Leave (Dkt. Nos. 257-12-17, 19, 21-26, 28-30, 32, 35-39, 41)	Non-public email addresses of Google employees.

6. Attached hereto as **Exhibit A** is a true and correct copy of Exhibit 19 to Plaintiffs’ Motion for Leave to File Amended Complaint, which has been redacted to reflect the limited material Google seeks to seal.

7. In Exhibits 4–9, 11, 13–24, 27–31, 33 to Motion for Leave (Dkt. Nos. 257-12-17, 19, 21-32, 35-39, 41), Google seeks to seal employee email addresses. Google proposes to narrowly tailor the information to be redacted to allow the employee names and the Google domain name to be filed publicly. For example, when an email is sent from “First Name Last Name <uniqueaddress@google.com>,” Google only proposes to seal the “uniqueaddress” part. When an employee’s email address includes the “@” symbol, but does not include the domain, Google proposes to redact the “@.” I understand an associate in my office has discussed this with Plaintiffs’ counsel who do not oppose this request.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed November 15, 2022, at San Francisco, California.

/s/ Eduardo E. Santacana  
EDUARDO E. SANTACANA